

Matt Dayton, Esq., NSB No.
Kevin Soderstrom, Esq., NSB No. 10235
GHIDOTTI BERGER, LLP
7251 West Lake Mead Blvd. Suite 470
Las Vegas, NV 89128
Tel: (949) 427-2010
Fax: (949) 427-2732
bknotifications@ghidottiberger.com

Attorney for Secured Creditor
BCMB1 Trust, its successors and assigns

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA, RENO DIVISION**

| | | |
|---------------------------|---|--|
| In Re: |) | CASE NO.: 22-50549-nmc |
| |) | Chapter 13 |
| Patricia A Sheehan |) | |
| |) | |
| Debtor. |) | STIPULATION RESOLVING OBJECTION |
| |) | TO CONFIRMATION OF PLAN |
| |) | |
| |) | [90 Tequilla Court, Sparks, Nv 89436] |
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BCMB1 Trust, its successors and/or assigns (“Secured Creditor”) by and through its attorney of record, GHIDOTTI | BERGER LLP, and the Debtor, Patricia A. Sheehan (“Debtor”), by and through her attorney of record, William A. Van Meter and Kevin A. Darby of Darby Law Practice, Ltd., enter into this Stipulation based upon the following facts.

RECITALS

1. Secured Creditor is the holder of the original Promissory Note dated October 3, 2006 in the principal amount of \$156,000.00, which is secured by a Deed of Trust encumbering the real property commonly described as 90 TEQUILLA COURT, SPARKS, NV 89436 (the

1 “Property”). Secured Creditor has become beneficiary by virtue of recorded Assignments
2 of Deed of Trust attached as exhibits to the Proof of Claim.

- 3 2. Debtor filed a Chapter 13 Petition on October 17, 2022 as case number 22-50549. Secured
4 Creditor filed its Proof of Claim on November 15, 2022 as Claim #1-1 reflecting a full
5 balance claim in the amount of \$324,994.32 as the loan matured on November 1, 2021.
6 3. On or about November 14, 2022, Debtor moved to enter the Mortgage Modification
7 Program which was granted on December 1, 2022 [D.E. 15, 20, respectively].
8 4. Debtor’s loan modification application was denied. On or about February 8, 2023, Debtor
9 by and through counsel accepted an offer made at mediation (held on January 27, 2023) for
10 six months to market and sell the Property, where Secured Creditor’s lien would be paid in
11 full out of escrow pursuant to an updated payoff.

12 **STIPULATION**

- 13 5. Debtor and Secured Creditor agree that Debtor shall have six months to market and sell the
14 Property, where Secured Creditor’s lien will be paid in full out of escrow pursuant to an
15 updated payoff.
16 6. This six month timeframe begins February 3, 2023 and ends August 2, 2023.
17 7. If no sale is completed on or before August 2, 2023, Secured Creditor shall be entitled to
18 relief from the automatic stay.
19 8. Debtor shall file an amended plan consistent with this treatment and providing surrender or
20 termination of the automatic stay as of August 3, 2023.

21 DATED: 03/20/2023

22 By: /s/ Kevin Soderstrom

23 Kevin Soderstrom, NSB No. 10235

24 Matt Dayton, NSB No. 11552

25 Ghidotti Berger, LLP

26 Attorney for Secured Creditor

27 DATED: 03/20/2023

28 By: /s/ Tricia Darby

Kevin A. Darby

William Van Meter

Darby Law Practice, Ltd.

Attorney for Debtor

CERTIFICATE OF SERVICE

I am employed in the County of Orange, State of California. I am over the age of eighteen and not a party to the within action. My business address is 1920 Old Tustin Ave., Santa Ana, CA 92705.

I am readily familiar with the business's practice for collection and processing of correspondence for mailing with the United States Postal Service; such correspondence would be deposited with the United States Postal Service the same day of deposit in the ordinary course of business.

1. On March 20, 2023, I served the following document:

STIPULATION RESOLVING OBJECTION TO CONFIRMATION OF PLAN

2. I served the above-named document by the following means to the persons as listed below:

a. ECF System

Counsel for Debtor
KEVIN A. DARBY
kevin@darbylawpractice.com

Chapter 13 Trustee:
WILLIAM A. VAN METER
ECF@reno13.com

b. United States mail, postage fully prepaid

Debtor
PATRICIA A. SHEEHAN
90 TEQUILLA COURT
SPARKS, NV 89441

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: March 20, 2023

By: /s/ Michaela Rice